

## **The Carer's Assistance (Carer Support Payment) (Scotland) Regulations 2023 – submission from MECOPP**

The points below refer to the salient barriers that the marginalised communities we support in practice face. Therefore relevant to the implementation of CSP.

**1. Complexity of the Existing System:** In order to receive Carer's Allowance, an applicant must already be in receipt of an existing qualifying benefit, and must then make a claim for CA. This can also affect their Universal Credit or can affect other benefits (such as someone else getting CA or attendance allowance). So the existing system is incredibly complex because of the multiple different interactions between different forms of benefits.

**2. Cascading Delays:** Because the eligibility is predicated upon being in receipt of a qualifying benefit, any delays to starting that benefit will add on to delays in getting Carer Support Payments. Currently, the Adult Disability Payment waiting times are over six months. This means that if someone is trying to get CSP/CA, they would need to wait 6 months to get the qualifying benefit, then additional months for the CSP/CA claim to be processed. This means having to bear several months of financial hardship before getting the support they need.

**3. Diminished Benefit when Overlapping with Universal Credit:** Where someone receives UC because they do not work and they are a full-time carer, the CA amount is deducted from UC as it is deemed as a taxable income. The applicant is usually given the Carer Component of UC, which is £180 a month. But their entire CA amount is deducted from UC. Because of this, the benefit to the family of receiving CA versus not receiving CA is very small and often not worth the complexity to apply.

**4. Language (has a multiplicative effect on all of the above):** Language by itself is a barrier because people seldom can access the information and understand the process to begin with. But the more complexity in the system, and the more the system interacts with other benefits like above, the more difficult it is for an applicant to understand, and thus the harder the language barrier gets. In the above scenario, not only would an applicant have to understand the process of how to apply, by they would also have to understand the complex interactions CA/CSP has with other benefits, the technicalities of UC deducting CA but also providing a supplementary Carer's Component to UC payments, etc. Having to explain all of this for someone for whom English is not a first language is very difficult.

**5. Level of Education:** Often, many carers we work with have limited education when it comes to understanding their own rights in the UK or being able to know what services and processes are available to them. They do not know, for example, how to appeal decisions or seek recourse when their rights are not being met.

**6. Trained Advisors:** Native English speakers can avail of specialist advisors through Citizen's Advice for support and advocacy. However, for the communities we serve, they do not have access to the same level of resources outside of charities like us. So their ability to advocate for themselves is very limited, as they cannot avail of support as readily as the majority population. And because there are very

few organisations like us, it creates a lot of pressure on us, but from the perspective of applicants and service users it creates a huge choke point and backlog.

The above points are relevant to the implementation of CSP and therefore should be considered.

Thank you

Margaret Chiwanza CEO